

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

IN THE MATTER OF THE  
SEARCH OF THE HOPE  
WELLNESS MANAGEMENT, PLLC  
PREMISES LOCATED AT 207-A  
OAKDALE ROAD, JAMESTOWN,  
NC 27282 AND 236 LE PHILLIP  
COURT, CONCORD, NC 28025.

1:22MJ7-1

1:22MJ8-1

MOTION TO SEAL

NOW COMES the United States of America, by Sandra J. Hairston United States Attorney for the Middle District of North Carolina, through her assistant, Ashley E. Waid, and respectfully moves this Honorable Court to seal the search warrant affidavit, Attachment B to the search warrants, and the supplement to this motion in these matters. Such sealing is within the inherent power of the court to control papers filed with it. See, e.g., *Baltimore Sun Co. v. Goetz*, 886 F.2d 60, 64 (4th Cir. 1989). In support whereof, the government shows unto the court the following:

(1) The search warrant materials relate to an investigation into a criminal conspiracy. The co-conspirators continue to operate and the investigation into their unlawful conduct is ongoing.

(2) Premature disclosure of the contents of search warrant materials may warn the targets of this investigation leading to potential destruction or

alteration of evidence and/or witness tampering.

(3) Therefore, premature disclosure of the contents of the search warrant materials and the supplement to this motion may have a significant negative impact on the effectiveness of the continuing investigation.

WHEREFORE, the government respectfully moves that this Honorable Court seal the search warrant affidavit, Attachment B to the search warrants, and the supplement to this motion, until further order of the Court.

This the 2nd day of March, 2022.

Respectfully submitted,

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